

AO91 (Rev. 12/03) Criminal Complaint

AUSA

United States District Court  
Southern District of Texas  
FILED

## UNITED STATES DISTRICT COURT

APR 15 2019

Southern District Of Texas Brownsville Division

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

David J. Bradley, Clerk of Court

vs.

Case Number: B-19-

469-MJ

1 Michael Christian CRUZ

A203 578 844 United States

2 Mario Alberto SALOMON

A203 578 845 United States

AKA Mario Alberto SALOMAN

I, the undersigned complainant state that the following is true and correct to the best of my

knowledge and belief. On or about April 13, 2019 in Cameron County, inthe Southern District Of Texas defendant(s)

knowingly, willfully, and unlawfully combine, conspire and agree, in reckless disregard of the fact that (1) undocumented alien had entered the United States in violation of law and was then and there present in the United States in violation of law, did transport and move said alien(s) by means of a motor vehicle with intent to further his unlawful presence,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(v)(I)(ii)

I further state that I am a(n) Border Patrol Agent and that this complaint is based on the following facts:

On April 13, 2019 at approximately 9:05 p.m., Border Patrol Agents were conducting checkpoint operations at the Highway 4 checkpoint in Brownsville, Texas when red in color Chevrolet Tahoe approached primary lane for inspection. Agents identified themselves and questioned the passengers as to their citizenship. The driver, identified as Michael Christian CRUZ, and front passenger, identified as Mario Alberto SALOMON stated they were citizens of the United States. A rear passenger was question as to his citizenship and his response was to look to the front 2 passengers for guidance. Subject appeared nervous and had a blank stare. Agents requested documentation from the subject who was unable to provide any. Agents instructed the driver to proceed into secondary for further investigation.

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

Signature of Complainant

Ramirez, Jesus Border Patrol Agent

Printed Name of Complainant

Sworn to before me and signed in my presence,

April 15, 2019

Date

at

Brownsville, Texas

City/State

Ignacio Torteya III

Name of Judge

U.S. Magistrate Judge

Title of Judge

Signature of Judge

United States District Court  
Southern District of Texas  
**FILED**

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**AFFIDAVIT**

In support of Criminal Complaint

David J. Bradley, Clerk of Court

**UNITED STATES OF AMERICA****CRIMINAL COMPLAINT****V.**Michael Christian CRUZ  
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At secondary, the rear passenger, identified as Carlos LUCAS-Marcos, admitted to being illegally present in United States without any documentation.

All 3 subjects were transported to the Fort Brown Border Patrol Station for further case development.

After further investigation, a statement by the Co-Principal and statement with photo lineup from the material witness, it was revealed that subjects Michael Christian CRUZ and Mario Alberto SALOMON were the ones that were transporting Carlos LUCAS-Marcos in furtherance into the United States.

SUBSCRIBED and SWORN to before me this 15th day of April, 2019.

Signature of Judicial Officer

Ramirez, Jesus Border Patrol Agent  
Signature of Complainant